



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 30 1994

3/30/94
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US EPA RECORDS CENTER REGION 5



487643

REPLY TO THE ATTENTION OF.

HSE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Isaiah Watson
427 North 24th St.
East St. Louis, IL 62205

Re: Request for Information Pursuant to Section 104(e) of CERCLA
for the Isaiah Watson Site in Cahokia, Illinois.

Dear Mr. Watson:

The United States Environmental Protection Agency (U.S. EPA) is currently investigating the source, extent, and nature of the release or threatened release of hazardous substances, pollutants, or contaminants at the Isaiah Watson site, located in Cahokia, Illinois (hereinafter referred to as the "Site"). This investigation requires inquiry into the generation, storage, treatment, and disposal of such substances that have been or threaten to be released at the Site. U.S. EPA is also investigating the ability of persons connected with the Site to pay for or perform a clean-up of the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499, you are hereby requested to respond to the Information Requests enclosed. Compliance with the enclosed Information Requests is mandatory. Failure to respond fully and truthfully to each and every Information Request within ten (10) business days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA which, as amended, authorizes the United States to seek penalties from a federal court of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. "Non-compliance" is considered by U.S. EPA to be not only failure to respond to the Requests, but also failure to respond completely and truthfully to each Request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties of up to ten thousand dollars (\$10,000) or up to five (5) years of imprisonment or both under 18 U.S.C. § 1001.



Printed on Recycled Paper

The U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

This Information Request is directed to you, your company, its officers, directors, and employees, and its subsidiaries, divisions, facilities, and their officers, directors, and employees. The relevant time period for this request is 1970 to the present. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Your response to this Information Request should be mailed to:

Peggy Schwebke
Emergency Support Section
U.S. Environmental Protection Agency (HSE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Please direct any questions you may have to Ms. Schwebke at (312) 886-0758. If you have any legal questions, contact Eileen Furey at (312) 353-6124.

Due to the seriousness of the problem at the Site and the legal ramifications if you fail to respond promptly and properly, U.S. EPA strongly encourages you to give this matter your immediate attention and to respond to these Information Requests within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,



for Richard C. Karl, Chief
Emergency & Enforcement Response Branch

Enclosure

Requests for Information Pursuant to Section 104(e) of CERCLA

INSTRUCTIONS

1. You must respond to the Information Request on the basis of all information and documents in your possession, custody, or control or in the possession, custody, or control of your former or current employees, agents, servants, contractors, or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge and regardless of source.
2. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to U.S. EPA. Moreover, should the Respondent find, at any time after the submission of its response, that any portion of the submitted information is false or misrepresents the truth, respondent must notify U.S. EPA as soon as possible.
3. To the extent that any information you provide relating to these Requests is based on your personal knowledge, or the personal knowledge of your employees, agents, or their representatives, this information shall be in the form of a notarized affidavit.
4. If any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, identify each such document, identify the person to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.

DEFINITIONS

For the purpose of the Instructions and Information Requests set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of the Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust, or governmental entity, unless the context indicates otherwise.
3. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, abandonment, or discarding of barrels, containers, and other

closed receptacles containing any hazardous substances or pollutants or contaminants.

INFORMATION REQUESTS

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances by you, your contractors, or by prior owners and/or operators.
5. State the dates during which you owned, operated, or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., deeds, leases, etc.).
6. Describe the nature of your activities or business at the Site.
7. Did you ever use, purchase, store, treat, dispose, transport, or otherwise handle any hazardous substances or materials at the Site? If the answer to the preceding question is anything but an unqualified "no", identify:
 - a) The chemical composition, characteristics, and physical state (e.g., solid, liquid) of each hazardous substance;
 - b) Who supplied you with such hazardous substances;
 - c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;
 - d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;

e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you; and

f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.

8. Identify the acts or omissions of any persons, other than you, your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

9. Provide copies of all income tax returns sent to the federal Internal Revenue Service in the last three years.

10. Identify all liability insurance policies held by Respondent from 1970 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

bcc: Eileen Furey, ORC (CS-3T)
Fred Bartman, OSC (HSE-5J)
Jose Cisneros, ESS (HSE-5J)
Peggy Schwebke, ESS (HSE-5J)
Oliver Warnsley, RP-CRU (HSM-5J)
Toni Lesser, Public Affairs (P-19J)
EERB Site File
EERB Read File
Fred Policarpio (HSRLT-5J) w/o attachments

Pschucke 2/8E-5J
P 188 57E 309

ISAIAH WATSON
427 NORTH 24TH ST.
EAST ST. LOUIS, IL 62205

PS Form 3800, June 1991

Postage	\$ 1.52
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$ 2.52
Postmark or Date	

CHICAGO, ILL. APR 1 1991
USPO

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES AND FEES.**

1. If you want this receipt postmarked, stick the gummed stub to the front of the article, leaving the receipt attached and present the article at a post office or to your rural carrier (no extra charge).
2. If you do not want this receipt postmarked, stick the gummed stub to the back of the article, address of the article, date, detach and retain the receipt, and return the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

☆ U.S. GPO: 1991—302-916

PS Form 3800, June 1991 (Reverse)

on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

ISAIAH WATSON
427 NORTH 24TH ST.
EAST ST. LOUIS, IL 62205

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

Article Number

P188 576 309

Service Type

Registered

☐ Insured

Insured

☐ COD

Express Mail

☐ Return Receipt for Merchandise

Other Service of Delivery

4-5-94

8. Addressee's Address (Only if requested and fee is paid)

Is your RETURN RECEIPT REQUESTED?

9. Signature (Agent)

PS Form 3811, December 1991

☆U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



Official Business

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



Schweble

U.S. ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY & ENFORCEMENT RESPONSE BRANCH
77 W. JACKSON BOULEVARD (HSE-5J)
CHICAGO, ILLINOIS 60604